

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

BEARBOX LLC and AUSTIN STORMS,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. 21-534-MN-CJB
	)	
LANCIUM LLC, MICHAEL T.	)	<b>REDACTED VERSION</b>
MCNAMARA, and RAYMOND E. CLINE, JR.	)	
	)	
Defendants.	)	

**DECLARATION OF ADAM M. KAUFMANN IN SUPPORT OF  
DEFENDANTS' RESPONSE IN OPPOSITION TO PLAINTIFFS'  
MOTION TO EXCLUDE CERTAIN TESTIMONY OF DR. MARK EHSANI**

I, Adam M. Kaufmann, under the penalties for perjury states:

1. I have personal knowledge of the facts set forth in this Declaration; I am competent to testify as to all matters stated in this Declaration; and, I am not under any legal disability that would preclude me from testifying. If called upon to do so, I would testify to the facts set forth in this Declaration.

2. I am a partner at the law firm Barnes & Thornburg LLP, counsel of record for Defendants Lancium LLC, Michael T. McNamara, and Raymond E. Cline, Jr. (collectively, "Defendants") in the above-captioned case. I am licensed in the State of Illinois and admitted *pro hac vice* to practice before this Court. I submit this declaration in support of Defendants' Response in Opposition to Plaintiffs' Motion to Exclude Certain Testimony of Dr. Mark Ehsani.

3. Attached to this Declaration as Exhibit 1 is a true and correct copy of excerpts of the Expert Report of Mark Ehsani, Ph.D., dated May 6, 2022.

4. Attached to this Declaration as Exhibit 2 is a true and correct copy of excerpts from the deposition transcript of Mark Ehsani, Ph.D., dated June 6, 2022.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: July 19, 2022

A handwritten signature in blue ink, appearing to read 'Adam Kaufmann', is written above a horizontal line.

Adam Kaufmann